

## Edward Fadel

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**From:** Kern, Robert W. (USAOHN) <Robert.Kern@usdoj.gov>  
**Sent:** Monday, April 8, 2019 2:15 PM  
**To:** Kevin Vogel  
**Cc:** Henderson, Carmen E. (USAOHN); Rice, Chelsea S. (USAOHN); Christos Georgalis; Edward Fadel  
**Subject:** RE: USA v. Tyson, 18-CR-708: Correspondence re Discovery

Kevin, Chris & Ed:

I received your email on Thursday, and got the hard copy of the letters today. During Carmen and Chelsea's absence, I am acting as the point of contact on their cases and serving as the "conduit" of information.

Please understand that I am trying my best to facilitate this process or exchange during their absences.

As to the overall requests, I have reached out to Carmen and Chelsea for assistance, and will respond more completely in the next few days.

Meanwhile, it is my understanding that at least one request pertains to text messages and phone calls (AT&T records). My understanding is that we do not have content of any of these messages or calls, merely the toll records. It is also my understanding that Carmen and Chelsea produced the "relevant" texts or call tolls to you already, but perhaps not the entire universe of the AT&T records. If you want the entirety of these records, please let me know and we will make arrangements to produce them. I honestly do not know the volume of the records you're referring to, so I will need to investigate further.

Also, as to the records pertaining to the land bank (request nos. 5-8), Carmen has asked the agents to again review their files and verify if they have any of this information. My initial impression is that they do not, but we have asked them to check again and will respond to you as soon as I hear back from the agents this week.

Lastly, your request for Jencks material at this time is acknowledged, but as you have noted in your request, we are not required to provide Jencks material this far in advance of trial.

Best regards,

Bob Kern

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**From:** Kevin Vogel <kevin@flannerygeorgalis.com>  
**Sent:** Thursday, April 4, 2019 12:36 PM  
**To:** Kern, Robert W. (USAOHN) <RKern@usa.doj.gov>  
**Cc:** Henderson, Carmen E. (USAOHN) <chenderson@usa.doj.gov>; Rice, Chelsea S. (USAOHN) <CRice@usa.doj.gov>; Christos Georgalis <chris@flannerygeorgalis.com>; Edward Fadel <edward@flannerygeorgalis.com>  
**Subject:** USA v. Tyson, 18-CR-708: Correspondence re Discovery

Good afternoon Bob,

Please find attached correspondence regarding discovery in the Tyson matter.

Many thanks,

Kevin

Kevin J. Vogel  
Flannery | Georgalis, LLC  
1375 E. 9th St., 30th Floor  
Cleveland, OH 44114  
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